



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 15, 2023

BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*,
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State (“State Department”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). On behalf of the government, and together with the plaintiffs, I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from June 19 to August 18, 2023), that the pretrial conference currently scheduled for June 30, 2023, be adjourned *sine die*, and that the parties be permitted to submit a joint update letter by August 17, 2023. This is the second request by either party to for an extension of time to respond to the complaint and adjourn the pretrial conference.

The reason for this request is that the parties are discussing the status of the case in light of the Government’s April 24, 2023 letter to plaintiffs advising that no responsive documents were found. The parties have been discussing the Government’s response and whether the case can be resolved without further Court intervention. We thank the Court for its consideration of this letter.

Respectfully submitted,

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Attorney for Defendant

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cc: *Plaintiffs’ counsel* (by ECF)